UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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Proposed Co-Counsel for the Official

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In re:

LTL MANAGEMENT, LLC, 1

Debtor.

MASSEY & GAIL LLP

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Proposed Co-Counsel for the Official Committee

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Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

SUPPLEMENTAL CERTIFICATION OF JONATHAN S. MASSEY, ESQ IN SUPPORT OF THE APPLICATION FOR RETENTION OF PROFESSIONAL

- I, Jonathan S. Massey, being of full age, certify as follows:
 - 1. I am seeking authorization to be retained as Special Counsel to the Official Committee of Talc Claimants for LTL Management, LLC (the "Committee").
 - 2. This certification (the "Supplemental Massey Certification") shall supplement my certification in support of the retention of Massey & Gail LLP ("Massey & Gail") as special counsel to the Committee filed on May 3, 2023 (the "Massey Certification").

 [Doc 402]
 - 3. The following individuals are working on this matter or are expected to work on this matter. To the extent additional individuals are later assigned, their rates will be consistent with the proposed arrangement for compensation detailed in the Massey Certification.

Professional/Paraprofessional	Hourly Rate
Jonathan S. Massey, Partner	\$ 1160
Matthew Collette, Partner	\$ 1000
Rachel S. Morse, Partner	\$ 860
Jeremy Mallory, Counsel	\$ 800
Bret Vallacher, Partner	\$ 775
Anne Swift, Associate	\$ 595
Kate Bjorklund, Associate	\$ 500
Schuyler Davis, Associate	\$ 500
Matthew Layden, Associate	\$ 500
Usama M. Ibrahim, Associate	\$ 485
Robert Aguirre, Paralegal	\$ 320
Kathy Martinez, Case Assistant	\$ 90

4. As previously disclosed in the Massey Certification, Massey & Gail has represented Walmart, Inc. The percentage of Massey & Gail's gross income received from Walmart, Inc. was approximately 2.4% in 2021 and 4.1% in 2022. As further stated in the Massey Certification, Massey & Gail represented an affiliate of Alix Partners as a petitioner for writ of certiorari in the US Supreme Court in an unrelated litigation where certiorari was denied in 2019. Massey & Gail has not received any income from Alix

Partners in the past two years.

- 5. The following information is provided pursuant to paragraph D.1 of the U.S. Trustee Guidelines.
 - a) Massey & Gail will comply with the United States
 Trustee's Fee Guidelines in connection with this engagement and
 has not agreed to variations from standard customary billing
 arrangements.
 - b) None of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case.
 - c) The Committee has approved Massey & Gail's general staffing plan and a budget covering the period from retention on April 14, 2023 through July 31, 2023, which was described in a separate letter from Massey & Gail to the Committee.
- 6. Finally, I hereby supplement the disclosure in the Massey Certification as follows:
 - a) A recently hired attorney at Massey & Gail previously worked as an associate at Jones Day (2018-2019) and a summer associate at Sidley Austin, but did not work on any Johnson & Johnson matters or any bankruptcy matters for any client at either firm.
 - b) Another recently hired attorney at Massey & Gail previously worked as a relationship banker (a non-legal role) at a local branch of Bank of America.

I certify under penalty of perjury that the above information is true.

Date:	June 2, 2023	/s/ Jonathan S. Massey	
		JONATHAN S. MASSEY, ESQ.	